

UNITED STATES DISTRICT COURT

LODGED

CLERK, U.S. DISTRICT COURT

JUN 14 2024

CENTRAL DISTRICT OF CALIFORNIA

BY: _____ rsm DEPUTY

United States of America

v.

AKOP JACK KANTRDZYAN,
Defendant.Case No. **2:24-MJ-03571-DUTY****CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

FILED
CLERK, U.S. DISTRICT COURT

06/14/2024

CENTRAL DISTRICT OF CALIFORNIA
BY: _____ KL DEPUTY

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about June 13, 2024, in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of Firearm

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/ DeAngelo Collier, Homeland Security (HSI)

Complainant's signature

DeAngelo Collier, Homeland Security (HSI)

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

June 14, 2024

Alicia L. Rosenberg

Judge's signature

City and state: Los Angeles, California

Hon. Alicia Rosenberg, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, DeAngelo Collier, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Akop Jack Kantrdzyan ("KANTRDZYAN") for a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent ("SA") with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and have been so employed since April 2023. I am currently assigned to the HSI Ventura-Northridge Office which is responsible for investigating federal crimes involving child exploitation, child pornography, cybercrimes, immigration crimes, human-rights violations, human smuggling, smuggling of narcotics, firearms,

and other types of contraband, financial crimes, and various other violations of immigration and customs laws. Through my training, I have learned of HSI's criminal investigative authority, as well as investigative techniques. Through my training and experience, I have become familiar with the methods of operation used by people who are involved with possession of illegal firearms.

4. I have completed six months of federal criminal investigator training at the Federal Law Enforcement Training Centers ("FLETC") in Georgia. My training at the FLETC in Georgia included but was not limited to, interviewing, firearm investigations, the fourth amendment and caselaw interpreting it.

5. As part of my duties as a Special Agent with HSI, I investigate various violations of federal law. During my time as a HSI SA, I have testified in grand jury and assisted in narcotics and firearms investigations.

6. I previously served as a United States Probation Officer in the District of Minnesota from June 2021 until April 2023. I completed a month of federal law enforcement training at the Federal Law Enforcement Training Centers in South Carolina. I supervised defendants convicted of federal offenses. I have written arrest warrants, violation reports, and petitions, and conducted interviews of defendants convicted of federal offenses.

7. Before serving as a United States Probation Officer, I was a Truancy Officer in Memphis, Tennessee from September 2015

until June 2021. My job responsibilities included but were not limited to monitoring school attendance, and issuing arrest warrants and criminal summons for parents of students who accrued a high number of unexcused absences.

8. I obtained a Masters in Criminal Justice from the University of Mississippi. I obtained a Bachelors in Criminal Justice from the University of Memphis.

III. SUMMARY OF PROBABLE CAUSE

9. On June 10, 2024, federal search warrants were issued by the Honorable Joel Richlin, U.S. Magistrate Judge, authorizing the search of the person of Akop KANTRDZYAN (the "SUBJECT PERSON") (No.24-MJ-03390); and the premises at 11965 Terra Bella Street, #13, Sylmar, California 91342 (the "SUBJECT PREMISES") (No.24-MJ-03389) for the following offenses; 18 U.S.C. § 545 (Smuggling Goods into the United States), 18 U.S.C. § 922(g)(1) (Felon in Possession of Firearm or Ammunition), 18 U.S.C. § 922(l) (Unlawful Importation of a Firearm/Silencer), 26 U.S.C. § 5861(d) (Possession and Receipt of Unregistered Firearm/Silencer), 26 U.S.C. § 5861(i) (Receipt of Firearm/Silencer without Serial Number), and 26 U.S.C. § 5861(k) (Possession and Receipt of Unlawfully Imported Firearm/Silencer) (together, the "Subject Offenses")

10. On June 13, 2024, Homeland Security Investigations ("HSI"), the Federal Bureau of Investigations ("FBI") and the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), (collectively "investigators") executed federal search warrants for KANTRDZYAN and the SUBJECT PREMISES. During the search,

agents found a FNS .40 caliber handgun, Serial Number CSU0008531, in the rear seat center armrest of a 2023 Audi S8, California license plate number 9FFD268, registered to Marina Khachikyan, KANTRDZYAN's significant other, located in the driveway of the SUBJECT PREMISES. KANTRDZYAN claimed ownership of the FNS .40 caliber handgun to investigators.

11. KANTRDZYAN is a convicted felon, and therefore not allowed to possess firearms.

IV. STATEMENT OF PROBABLE CAUSE

12. Based on my review of law enforcement reports, conversations with other law enforcement officers, and my own knowledge of the investigation, I am aware of the following:

A. KANTRDZYAN claims ownership of the FNS .40 caliber handgun, Serial Number CSU0008531.

13. HSI SAs DeAngelo Collier and Matthew Hernandez interviewed KANTRDZYAN at the SUBJECT PREMISES. Before the start of the interview, HSI SA Hernandez advised KANTRDZYAN that he was free to leave, that he was not being arrested and not mandated to speak with agents. KANTRDZYAN proceeded to speak with agents. During the interview, KANTRDZYAN claimed ownership of the FNS .40 caliber handgun, Serial Number CSU0008531 found in the Audi S8, California license plate number 9FFD268, registered to Marina Khachikyan, KANTRDZYAN's significant other. KANTRDZYAN told agents only he and Marina Khachikyan both drive the Audi S8 and no one else drives or has access to the Audi S8., the vehicle is registered to his significant other Marine Khachikyan.

B. Khachikyan denies ownership of the FNS .40 caliber handgun, Serial Number CSU0008531.

14. HSI SAs DeAngelo Collier and Matthew Hernandez interviewed Marina Khachikyan at the SUBJECT PREMISES. Agents advised Khachikyan that she was not under arrest, and that she was free to leave. Khachikyan admitted the Audi S8, California license plate number 9FFD268 is registered to her and that she and KANTRDZYAN drive the vehicle. Khachikyan admitted that she does not own any firearms. More specifically, the handgun found in the Audi S8 does not belong to her. Khachikyan told agent she never placed a handgun in the Audi S8, nor has she ever directed someone else to place a handgun in the vehicle.

C. KANTRDZYAN is a Convicted Felon and Prohibited from Possessing Firearms

15. I have reviewed law enforcement databases and learned KANTRDZYAN is a convicted felon and prohibited from possessing firearms. KANTRDZYAN is an Armenian national with an immigration Final Order of Removal with a temporary release in the United States. I learned that KANTRDZYAN has the following criminal history:

a. On or about December 9, 1997, KANTRDZYAN was convicted for burglary, a felony, in violation of California Penal Code Section 459, and was sentenced to 123 days in jail and 36 months' probation.

b. On or about April 22, 1998, KANTRDZYAN was convicted for shooting at an inhabited dwelling/vehicle/etc., a felony, in violation of California Penal Code Section 246, and was sentenced to 3 years' prison and 36 months' probation.

c. On or about November 10, 1999, KANTRDZYAN was convicted for burglary, a felony, in violation of California Penal Code Section 459, and sentenced to 365 days in prison and 36 months' probation.

d. On or about December 3, 1999, KANTRDZYAN was convicted for receive/etc known stolen property, a felony, in violation of California Penal Code section 496(a), and sentenced to 81 days in jail, 36 months' probation, and issued a fine.

e. In April 2001, an Immigration Judge issued a final order of removal for KANTRDZYAN, for being Convicted of Two or More Crimes Involving Moral Turpitude and Convicted of Aggravated Felony. The Final Order of Removal has not been executed because authorities have been unable to obtain a travel document from Armenia for KANTRDZYAN.

f. On or about February 6, 2002, KANTRDZYAN was sentenced to 32 months in prison for violation of parole and felon/etc possess firearm, in violation of California Penal Code Section 12021(a) (1).

g. On or about March 30, 2005, KANTRDZYAN was convicted for grand theft of access cards, get credit/etc: use other, a felony, in violation of California Penal Code Section 530.5(a)x, and sentenced to 16 months' prison.

h. On or about December 14, 2009, KANTRDZYAN was convicted for two counts of conspiracy to commit crime, each a felony, in violation of California Penal Code Section 182(a)(1), three counts of get credit/etc: use other, each a felony, in violation of California Penal Code Section 530.5(a) and grand

theft: money/labor/property, a felony, in violation of California Penal Code Section 487(a), and was sentenced to a total of 4 years in prison.

i. On or about April 25, 2014, KANTRDZYAN was convicted of conspiracy, a felony, in violation of 18 United States Code Section 371, and was sentenced to 60 months in prison and 36 months of supervised release.

D. Interstate Nexus

16. On June 13, 2024, I spoke with ATF Special Agent Interstate Nexus Expert David Lopez, who reviewed the FNS .40 caliber handgun, Serial Number CSU0008531, found in the Audi S8, California license plate number 9FFD268. ATF SA Lopez is trained in determining the interstate nexus of firearms and ammunition, and he physically examined the FNS .40 handgun and determined it was manufactured outside the State of California. Because the firearm was recovered in California, it traveled in and affected interstate or foreign commerce.

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V. CONCLUSION

17. For all of the reasons described above, there is probable cause to believe that KANTRDZYAN has committed a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 14th day of June, 2024.



HONORABLE ALICIA G. ROSENBERG
UNITED STATES MAGISTRATE JUDGE